

From: [Young, Jessica](#)
To: anthony.dykes@gorvis.com
Subject: RE: Meeting Request for Mr. Barry Breen -- Mercuria Energy / N+P Group
Date: Wednesday, July 6, 2022 2:02:00 PM

Dear Mr. Dykes,

Thank you for your interest in alternative fuels. Mr. Breen forwarded your request to me as my branch is responsible for the regulations involved in helping companies determine when their non-hazardous secondary material (NHSM) is a legitimate non-waste fuel, and Barry Breen requested that we follow up on your email regarding the regulations that would apply to your material/waste-derived fuels.

Below is a link to a guide that explains how to make a non-waste determination for fuels under the NHSM regulations that apply nation-wide. The guide also explains the Clean Air Act implications of such a determination.

<https://www.epa.gov/rcra/nhsm-guide-wastenon-waste-determinations>

Once you've had a chance to review the guide and determine how it would apply to your Subcoal material, please let us know if you have any questions.

Sincerely,
Jessica Young

Jessica Young
Chief of the Recycling and Generator Branch
Office of Resource Conservation and Recovery (ORCR)
Office of Land and Emergency Management (OLEM)
Work Cell: 571-721-9460
NEW Desk phone as of Oct 22: 202-566-0522

From: Anthony Dykes <anthony.dykes@gorvis.com>
Sent: Tuesday, June 28, 2022 2:16 PM
To: Breen, Barry <Breen.Barry@epa.gov>
Subject: Meeting Request for Mr. Barry Breen -- Mercuria Energy / N+P Group

Dear Mr. Breen,

I hope this message finds you well.

I am emailing you today on behalf of N+P Group, a company that provides innovative solutions to substitute fossil fuels with alternative, more environmentally friendly fuels.

N+P Group is a subsidiary of Mercuria Energy Group, one of the largest global independent energy traders. Mercuria has a major presence throughout the United States, including large offices in Houston, TX and Greenwich, CT and subsidiaries headquartered in Indiana, New York, among others.

I would like to request a meeting with you or another suitable member of your team to discuss N+P Group, specifically its Subcoal product.

Over the past several years, N+P Group has developed a highly sophisticated methodology to completely alter the physical properties of waste to create fuel called Subcoal, which emits significantly less CO₂ and decreases operational costs for customers. Unlike other alternative fuels or SRFs, Subcoal is made into uniform pellets that make it much cleaner and greatly reduces the risk of self-combustion.

There has been interest from U.S. companies in utilizing N+P Group's Subcoal product in their facilities, and we would like an opportunity to gain a better understanding of the guidelines and regulations around the permitting process for non-waste fuels in the United States.

I would be joined in the meeting by my colleagues, Mr. Matthew J. Lauer, Global Head of Public Affairs, and Ms. Grace Fenstermaker, Senior Policy Advisor, from Mercuria Energy Group.

We are available to meet in Washington, D.C. anytime this week or next week (Wednesday, June 29-Thursday, July 7). Given that it is a holiday weekend, we will make every effort to accommodate.

Please find a link [here](#) to N+P's website, where you can find more information on the company.

I look forward to hearing from you at your earliest convenience, and please let me know if you have any questions.

All the best, Anthony

Anthony Dykes
Senior Account Supervisor
+1 (202) 573-2181
anthony.dykes@qorvis.com

Disclaimer The information in this email and any attachments may contain proprietary and confidential information that is intended for the addressee(s) only. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, retention or use of the contents of this information is prohibited. When addressed to our clients or vendors, any information contained in this e-mail or any attachments is subject to the terms and conditions in any governing contract. If you have received this e-mail in error, please immediately contact the sender and delete the e-mail.